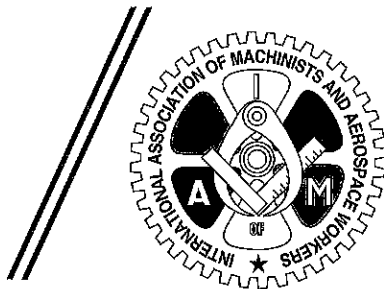


**International  
Association of  
Machinists and  
Aerospace Workers**



9000 Machinists Place  
Upper Marlboro, Maryland 20772-2687

Area Code 301  
967-4500



OFFICE OF THE GENERAL VICE PRESIDENT

GL 2 Legal

September 21, 2011

*Via Electronic Mail at <http://www.regulations.gov>*

Andrew R. Davis  
Chief of the Division of Interpretations and Statements  
Office of Labor-Management Standards  
U.S. Department of Labor, Room N-5609  
200 Constitution Avenue, NW  
Washington, DC 20210

Re: RIN 1215-AB79, RIN1245-AA03

Dear Mr. Davis:

The International Association of Machinists and Aerospace Workers ("IAM") would like to join with the American Federation of Labor and Congress of Industrial Organizations ("AFL-CIO") in support of the Department of Labor proposed rule on the Labor-Management Reporting and Disclosure Act; Interpretation of the "Advice" Exemption.

The IAM represents hundreds of thousands of employees, many of whom are members of our Union despite the efforts of consultants hired by employers to assist in persuading employees to turn against the union. We believe our existing union members, and potential members; have a right to know if anti-union activities are being conducted by outside consultants and how much their employers are paying for these anti-union persuader activities. The proposed rule, if put in place, would appropriately expand the reporting requirements of labor-relations consultants so that employees are more likely to know and comprehend the source of this persuader activity.

As the Department observes, the proposed interpretation is clearly founded on the statutory text. 76 Fed. Reg 36178 at 36182. Furthermore, the legislative history of the Labor-Management Reporting and Disclosure Act ("LMRDA") clarifies that one of the purposes of the LMRDA "was to promote an employee's freedom of choice by revealing to him or her the real source of persuader activity designed to influence the employee in the exercise of protected rights." 76 Fed. Reg 36178 at 36184. Thus, this reporting is required for employees to make informed decisions.

At present, while the union consultant persuader industry has grown exponentially, the reporting on the use of these consultants has been almost non-existent. (*See the AFL-CIO*

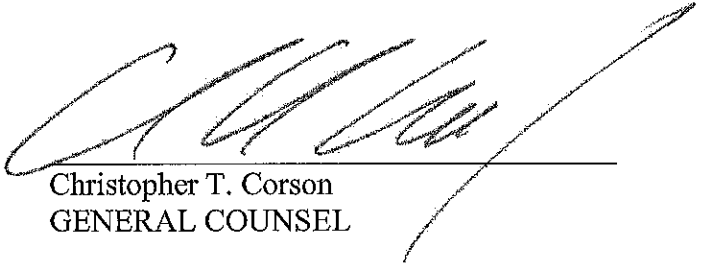
*comments*). The existing reporting rules have allowed this extremely minimal reporting. The proposed rule change is thus necessary for reporting on union consultant persuaders to happen, and for employees to be informed.

For these reasons, the IAM supports the Department of Labor's proposed rule.

Sincerely,

IAM LEGAL DEPARTMENT

By:

A handwritten signature in dark ink, appearing to read 'CTC', is written over a horizontal line. The signature is stylized and cursive.

Christopher T. Corson  
GENERAL COUNSEL

CTC/rc